

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

In the Matter of: : Case No. 14-52934
: Chapter 7; Judge John E. Hoffman, Jr.
AMT Machine Systems, Ltd. :
: Debtor. :

TRUSTEE’S MOTION TO REDUCE NOTICE PERIOD RELATING TO (A)
TRUSTEE’S MOTION FOR AUTHORITY (1) TO SELL INVENTORY, EQUIPMENT
AND FIXTURES AT AN ON-LINE AUCTION FREE AND CLEAR (2) TO PAY
AUCTIONEER, AND (3) TO PAY ALLOWED CHAPTER 7 ADMINISTRATIVE RENT
CLAIMS OF LANDLORD OF BUSINESS PREMISES AND OF STORAGE FACILITY,
(B) MOTION OF CHAPTER 7 TRUSTEE FOR AUTHORITY
TO DESTROY BUSINESS RECORDS, AND TO INCUR
AND PAY ADMINISTRATIVE EXPENSE CLAIM, (C) APPLICATION TO EMPLOY
OHIO MOBILE SHREDDING
AND TO COMPENSATE OHIO MOBILE SHREDDING FOR SERVICES RENDERED,
AND (D) APPLICATION TO EMPLOY AUCTIONEER
AND TO COMPENSATE AUCTIONEER FOR SERVICES RENDERED

William B. Logan, Jr., Trustee in the above-captioned case, hereby moves this court for an order pursuant to Rule 9006 of the Federal Rules of Bankruptcy Procedure reducing the notice period from 21 days to 10 days on (A) Trustee’s Motion for authority (1) to sell certain inventory, equipment and fixtures at an on-line auction free and clear of liens, claims, and encumbrances (2) to pay Auctioneer and associated expenses, and (3) to pay allowed Chapter 7 administrative rent claims of landlord of business premises and of a storage facility (Doc. 85)(“Sale Motion”), (B) Trustee’s Motion for Authority to Destroy Business Records and to Incur and pay Administrative Expense Claim (Doc 86), (C) Application to Employ Ohio Mobile Shredding and to Compensate Ohio Mobile Shredding For Services Rendered (Doc 87), and (D) Application to Employ Auctioneer and to Compensate Auctioneer for Services Rendered (Doc 88) . A memorandum in support of this motion follows.

Respectfully submitted,

/s/ Kenneth M. Richards

Kenneth M. Richards (0040455) Attorney for
William B. Logan, Jr., Trustee
LUPER NEIDENTHAL & LOGAN
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Memorandum in Support

Contemporaneously with the filing of this motion, Trustee has filed the Sale Motion in which the Trustee seeks authority, among other things to sell substantially all of the Debtor's assets, including furniture and related accessories and office equipment through an on-line auction. Trustee seeks an Order reducing the notice and response time relating to the Sale Motion from 21 days to 10 days.

Trustee believes that it is necessary and in the best interest of the bankruptcy estate for her to be allowed to proceed with the proposed sale of the assets as quickly as possible. Trustee also wants to reduce administrative claims. The monthly rent for the Debtor's business premises is \$4,157.25. Debtor also had assets in storage for which it agreed to pay \$1,000.00 per month. Trustee also wants to reduce any post-petition utility claims relating to the Debtor's business premises.

Trustee does not believe that the small reduction in the notice and response time will unduly prejudice creditors or parties-in-interest. Creditors still have sufficient time to file a response or objection to the Sale Motion.

In addition Trustee has filed an Application to retain an auctioneer. For the same reasons, Trustee believes it is necessary to reduce the notice period on this application since the

auctioneer cannot begin the auction process without being retained. Trustee has also filed an application to retain Ohio Mobile Shredding and a motion for authority to destroy certain business records. Trustee believes a reduced notice period is necessary for these applications since Trustee cannot vacate the Debtor's business premises and stop accruing rent until he has been able to destroy and dispose of these records.

For the foregoing reasons, therefore, Trustee respectfully urges this court to grant his motion and to reduce the applicable notice period on the Motions described herein from 21 days until 10 days from the date of service.

Respectfully submitted,

/s/ Kenneth M. Richards
Kenneth M. Richards (0040455) Attorney for
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 9, 2014, a copy of the foregoing was mailed electronically through the Court's ECF system upon the following:

- Allen B Aimar aaimar@riddellcolpa.net
- Asst US Trustee (Col) ustpregion09.cb.ecf@usdoj.gov
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And by regular U.S. Mail, postage prepaid, upon the following, and to parties on the attached list:

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/s/ Kenneth M. Richards

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